

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,
Debtors.

)
) Chapter 11
)
) Case No. 23-00623 (TJC)
)
) Jointly Administered
)
)
)

**[PROPOSED] ORDER GRANTING MOTION OF THE TRUST OVERSIGHT
COMMITTEE REQUIRING MERCYONE TO PRODUCE RECORDS AND SUBMIT
TO EXAMINATION PURSUANT TO BANKRUPTCY RULE 2004**

The matter before the Court is the *Trust Oversight Committee's Motion for Entry of Order Requiring MercyOne to Produce Records and Submit to Examination Pursuant to Bankruptcy Rule 2004* (the "Motion") filed by Mercy Hospital Liquidation Trust Oversight Committee as designee of the Liquidation Trustee (the "OC");¹ and the Court having found it has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that venue in this district is proper pursuant to 28 U.S.C. § 1409; and the Court having found that the relief requested in the Motion is in the best interests of the Debtor, its creditors, and other parties in interest; and the Court having found that the OC provided adequate and appropriate notice of the Motion under the circumstances and that no other or further notice is required; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein:

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED as follows:

1. The Motion is GRANTED as set forth herein.

¹ Capitalized terms not otherwise defined herein shall have the meanings given to them in the Motion.

2. The OC is authorized, pursuant to Bankruptcy Rules 2004 and 9016, to issue a subpoena to MercyOne for the production of the documents listed on Exhibit B of the Motion (the “Document Requests”).
3. MercyOne shall comply with the Document Requests no later than twenty-one (21) days after entry of this Order.
4. The OC is authorized, pursuant to Bankruptcy Rules 2004 and 9016, to issue subpoenas to testify to MercyOne, Robert Ritz, and Michael Trachta to testify on matters related to MIC and the Debtors at such time and place set forth on the subpoena (unless otherwise agreed in writing by the parties).
5. The foregoing is without prejudice to the OC’s right to seek additional discovery, including any additional documents or depositions, under Bankruptcy Rule 2004 and applicable law, based on any information that may be revealed as a result of the information provided pursuant to this Order or otherwise.
6. Notwithstanding any applicability of any Bankruptcy Rule, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
7. The OC has consented to the relief in this Order and is authorized to take all actions, and to execute all documents, necessary or appropriate, to effectuate the relief granted in this Order in accordance with the Motion.
8. The Court retains exclusive jurisdiction to hear and determine any and all disputes related to or arising from the implementation, interpretation, and enforcement of this Order.

Dated and entered this ____ day of _____, 2025.

Honorable Thad J. Collins, Chief Judge

Prepared and Submitted By:

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